

Manley, Melissa A

From: Richardson, Claudia CONT OASN (I&E) BRAC PMO West [claudia.richardson.ctr@navy.mil]
Sent: Tuesday, February 14, 2006 1:48 PM
To: Bonnevie, Nancy; Manley, Melissa A
Subject: FW: Water Board Site 17 Draft Final PP Comments

-----Original Message-----

From: Judy Huang [mailto:JCHuang@waterboards.ca.gov]
Sent: Tuesday, February 14, 2006 9:42
To: Richardson, Claudia CONT OASN (I&E) BRAC PMO West
Cc: DLOfstro@dtsc.ca.gov; MLiao@dtsc.ca.gov; Cook.Anna-Marie@epamail.epa.gov; Ripperda.Mark@epamail.epa.gov; Macchiarella, Thomas L CIV OASN (I&E) BRAC PMO West; Naomi Feger
Subject: Water Board Site 17 Draft Final PP Comments

Hi Claudia:

Below are our comments on the Draft Final PP for SPL.

I know you would like to send this to the printer today. However, Water Board is uncomfortable for the document to go Final without seeing the changes you made in response to Marks comments and any potential changes you might make due to our comments below.

What I do not want to see is yet another repeat of the Site 28 Draft Final PP. Significant and substantial changes to the Draft PP should be reviewed by the Regulators prior to the release of the Final document.

In this case, if we cannot work through and concur with the revisions prior to the public meeting, Water Board staff might be forced to provide comments at the public meeting.

I appreciate the help and understanding Navy has provided. Hopefully, we can work this through.

Thanks and have a wonderful day!

Judy

Comments on Draft Final Proposed Plan for SPL:

1. page 5, Paragraph 1: please rewrite this paragraph to eliminate reference to risks associated with San Francisco Bay reference stations. That was the intent of the earlier comment. Originally you had a sentence that stated in effect that human health risks were higher than reference for PCBs and now the Proposed Plan says they are the same, i.e. within an order of magnitude. The first two sentences need to be deleted.

2. Page 5, paragraph 2 Conclusions of the Remedial Investigation: the second bullet says ...there is a low potential for acute hazard or risk to the benthic community. One word should be selected hazard or risk, preferentially risk - or use the word impacts instead of either hazard or risk.

All references to forage fish should just read fish - since the forage fish were meant to represent fish in general. The bullet referencing remediation goals should read that they are protective of birds and fish.

The sentence of the bullet that reads, applying the RG developed for PCBs based on ecological exposures is expected to reduce concentrations in fish tissue sufficiently to address potential human health exposures.

Add the 200 ppb as a remedial goal to reduce risk to recreational fishers.

3. Remediation Goals (RGs)

We appreciate the Navy making the edit that was suggested in our November 28, 2005 comments for this paragraph with regard to the least tern. We think the proposed plan also needs to make it clear to the public that the least tern is considered the most sensitive receptor and that developing "safe" sediment concentration for the tern should protect other bird species that feed in the lagoon.

4. Reference to 200 as nearshore ambient. If the reference is left in the proposed plan for site 17 it should refer to the 200 numbers as the upper-estimate of nearshore ambient, since no one has done a robust estimate of nearshore ambient.

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